

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

EARL PARRIS, JR., Individually,)
and on Behalf of a Class of Persons)
Similarly Situated,)

Plaintiff,)

City of SUMMERVILLE,)
GEORGIA,)

Intervenor-Plaintiff,)

v.)

3M COMPANY, et al.)

Defendants.)

Case No.: 4:21-cv-00040-TWT

PULCRA CHEMICALS, LLC’S RESPONSE TO
CITY OF SUMMERVILLE, GEORGIA’S
AMENDED COMPLAINT IN INTERVENTION

In accordance with the Court’s February 16, 2023 Order [ECF 349], Defendant Pulcra Chemicals, LLC, in response to the City of Summerville, Georgia’s Amended Complaint in Intervention [ECF 351], hereby incorporates its defenses and responses to Plaintiff’s Second Amended Individual and Class Action Complaint [ECF 290] as if fully restated herein and is not required to file an Answer.

[Signatures continued on next page]

Respectfully submitted this 28th day of February, 2023.

/s/ Robert D. Mowrey

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***Attorneys for Defendant Pulcra
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CERTIFICATE OF SERVICE

I hereby certify that I have this 28th day of February, 2023, electronically filed the foregoing **PULCRA CHEMICALS, LLC'S RESPONSE TO CITY OF SUMMERVILLE, GEORGIA'S AMENDED COMPLAINT IN INTERVENTION** using the CM/ECF system which will automatically send email notification of such filing to all registered CM/ECF users.

/s/ E. Peyton Nunez
E. Peyton Nunez